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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

IN RE:  
John T Thomas §  
and § Case No. 13-70182HdH-13  
Rhonda Gayle Thomas §  
DEBTORS §

DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM  
AUTOMATIC STAY OF Brownings Reliable Cars & Trucks

TO THE HONORABLE JUDGE OF SAID COURT:

Come now Debtors in the above-titled cause and file this Response to Motion for Relief from Automatic Stay.

On September 3, 2013, Attorney for Brownings Reliable Cars & Trucks, Gail E. Stock, filed a Motion for Relief from Automatic Stay, in response thereto, Debtors would show the following:

1. ADMIT
2. ADMIT
3. DENY
4. DENY
5. DENY
6. DENY
7. DENY

WHEREFORE, PREMISES CONSIDERED, Debtors pray that motion be denied in all respects, that the Court award reasonable and necessary attorney fees for the defense of this Motion and for such other and further relief to which they may be entitled.

Respectfully submitted,

/s/Monte J. White  
Attorney for Debtors

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response to Motions for Relief from Stay was served by ECF and/or mailed on September 5, 2013, to the following as indicated:

/s/Monte J. White  
Attorney for Debtors

Movant: Brownings Reliable Cars & Trucks  
4570 Seymour Highway  
Wichita Falls, TX 76308

Attorney for Movant: Gail E. Stock  
Jameson & Dunagan, PC  
3890 W. Northwest Hwy, Suite 600  
Dallas, TX 75220

Trustee: Chapter 13 Trustee  
Walter O'Cheskey  
6308 Iola Ave.  
Lubbock, TX 79424

U.S. Trustee  
William T. Neary  
1100 Commerce Street, Room 9-C-60  
Dallas, TX 75242

Debtor: John T. Thomas  
Rhonda Gayle Thomas  
3033 Moffett  
Wichita Falls, TX 76308